

Mr. Torwater with the
Company informed me that
they transport plastic pellets
to be made into milk
jugs around to the dairies.
The only waste he had
is a quart jar of material
that is tested & pitched.
These quantities are too
small for RCRA.

He will have HQ send
us a letter requesting
that they be dropped from
RCRA. Call if you
have problems. Thanks

Janice 2/4/81



News Tips
on

PROTECTING YOUR
HEALTH AND SAFETY

CALL EACH WEEK FOR A TIMELY MESSAGE
FROM THESE GOVERNMENT AGENCIES-

- ◇ 1. CONSUMER PRODUCTS SAFETY COMMISSION
- ◇ 2. ENVIRONMENTAL PROTECTION AGENCY
- ◇ 3. FOOD AND DRUG ADMINISTRATION
- ◇ 4. OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION

BULK DISTRIBUTION CENTERS, INC.

POST OFFICE BOX 19022
LOUISVILLE, KENTUCKY 40219
(1-502) 968-4141

352-5011

April 29, 1981

Janice -
Mr. Helfrich appears to
have confused Superfund ;
RCRA. Call to be certain
he wishes to drop out
of RCRA, Before calling
check his notification
to see what they do.

Jim
5/4/81

The Administrator
United States Environmental
Protection Agency
Washington, D. C. 20460

Dear Sir:

Last year we registered terminals we operate as
potential generators of hazardous waste. We explained
in accompanying letters that we believed the nature of
our operations was such that we were excluded but filed
as a preponderance of caution.

The general information that accompanied your
recent Notification Form (EPA 8900-1) explained that we
were excluded under Item 4 of "who need not notify".

We appreciate this clarification and will close
our files on the following registrations:

Atlanta, GA	GAD047599485
Chattanooga, TN	TND098066640
Fort Lauderdale, FL	FLD089611776
Memphis, TN	MD0019571052
Louisville, KY	KYD046661062

Very truly yours,


K. G. Helfrich
President

KGH:jj

Enc. Your Form 8900-1

cc: US EPA Region 4
✓ US EPA Region 7

471-2675

441343



RCRA RECORDS

APR 30 1981

VII K.C., MO

8/19
- Ken Helfrich
will call back
- Mr. Helfrich told
me she went

General Information

The primary purpose of this notification program is to locate hazardous waste sites which treated, stored, or disposed of hazardous waste in the past and at which hazardous waste is still present. The most important information you can provide to EPA is the existence of a hazardous waste site and its location. For purposes of describing the hazardous waste to be found at a site, the quantities of such waste and the type of activity at a site, EPA is not requiring that you painstakingly document the information submitted. This information may be based on your knowledge, belief, recollection or reasonably available records.

Who Must Notify

Section 103(c) of Superfund requires that, unless exempted, the following must notify EPA:

- Any person who presently owns or operates a site where there are facilities that store, treat, or dispose of hazardous wastes.
- Any person who, at the time of disposal, owned or operated a site where there are facilities that store, treat, or dispose of hazardous wastes.
- Any person who accepted hazardous wastes for transport and selected a site where there are facilities that store, treat, or dispose of hazardous wastes.

Persons required to notify include individuals and private, public, and government entities.

Who Need Not Notify

1. Section 3010 of the Resource Conservation and Recovery Act (RCRA) requires any person who generates or transports hazardous wastes or who owns or operates a facility that treats, stores, or disposes of hazardous wastes to notify EPA of such activities. For purposes of this notification any person who notified under Section 3010 for one or more treatment, storage, or disposal facilities does not have to notify EPA again of those specific facilities. However, notification is required for facilities not previously reported under Section 3010 that are on or contiguous to sites reported under Section 3010.

2. A person does not have to notify of facilities that have qualified for Interim Status under RCRA.

3. Facilities at which less than 55 gallons (or 7.4 cubic feet) of hazardous wastes have been disposed are not subject to this notification requirement.

4. Locations where hazardous waste accumulated only as a result of minor leakage or spillage that occurred in the course of normal operations are not considered hazardous waste sites for purposes of this notification unless such accumulation may pose significant risk to human health and the environment.

5. Municipal landfills, town dumps and other facilities that receive household wastes only, are not subject to notification. Municipal landfills that received hazardous wastes, especially wastes in segregated shipments from industrial services, would be expected to notify.

6. Facilities at which hazardous wastes had been treated or stored and from which all those hazardous wastes have been removed so as to eliminate any risk to human health and the environment are not subject to this notification requirement.

7. The application of pesticide products registered under the Federal Insecticide, Fungicide and Rodenticide Act and the

handling and storage of such products by agricultural producers are not subject to this notification requirement. Sites at which pesticides have been disposed are subject to the notification requirement of Section 103(c). Farmers who have disposed of waste pesticide in a manner consistent with the disposal instruction on the pesticide label are not subject to this notification requirement.

8. Stoppage in transport of hazardous waste which is temporary, incidental to the transportation, or at the ordinary operating convenience of a common or contract carrier is not, for purposes of this notification, storage.

9. Certain facilities which handle hazardous wastes pursuant to RCRA are not subject to this notification requirement. They include:

- Product or raw material storage tanks and transportation vessels or vehicles which are presently in use are not considered hazardous waste storage facilities, even though hazardous waste may be generated in such units in the course of their use. This does not extend, however, to units which are no longer in use and in which hazardous waste remain.
- Short-term accumulation (90 days or less) of hazardous wastes by generators subject to RCRA regulations is not, for purposes of this notification, storage.
- Totally enclosed treatment facilities.
- Wastewater treatment tanks and neutralization tanks.

Wastes Subject To Notification

Wastes subject to notification under Superfund are listed or identified as hazardous in the regulations issued under Section 3001 of RCRA. You are not expected to sample wastes to determine if they are hazardous. Rather, you can use any knowledge you have of the wastes, including the materials or processes involved or the types of facilities that generate the wastes. You should notify about sites if you believe the wastes may be hazardous due to barrel labels, odors, health effects, or other indicators.

Polychlorinated biphenyls (PCBs) are not currently included within the RCRA Section 3001 regulations but are regulated under the Toxic Substances Control Act (TSCA). Consequently, notification of PCB treatment, storage, or disposal sites is not mandatory. However, in order to make this notification more comprehensive, EPA is requesting a voluntary notification of sites containing PCBs as part of this notification program.

Wastes Not Subject To Notification

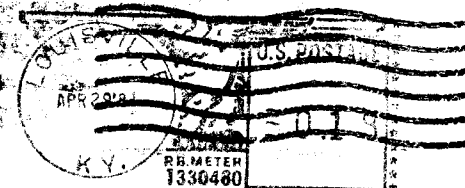
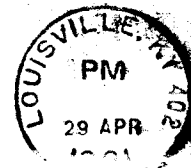
The following wastes are not subject to notification under Section 103(c) of Superfund.

1. Solid wastes listed below not presently regulated as "hazardous waste" under RCRA.
 - "Household waste", defined as any waste material (including garbage, trash, and sanitary wastes in septic tanks) derived from households (including single and multiple residences, hotels, and motels):
 - The growing and harvesting of agricultural crops.
 - The raising of animals, including animal manure.
 - Solid wastes generated by any of the following and returned to the soil as fertilizers:
 - The growing and harvesting of agricultural crops.
 - The raising of animals, including animal manure.
 - Mining overburden returned to the mine site.

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LOUISVILLE, KENTUCKY 40219



US EPA Region 7
Sites Notification
Kansas City, MO 64106